

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF QUEENS

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JIMMY L. ADKINS, KEREM BAY, LANA  
BONGIOVI, CLEMENT CAMPBELL, ANGELA  
CAROPOLA, ALEXANDER CIOFFI, PATRICK H.  
CRAIN, DAVID CRONK, NANCY F. DEBE,  
DENNIS DELUCE, CHARLES J. ENGEL,  
MATTHEW FARRELL, BENNY FAILLA, ROBERT J.  
GIANI, JOHN J. LACKENBAUER,  
JEAN-PARNELL LOUIS, WILLIAM J. MAHER,  
MICHAEL G. MCDOWELL, WILLNER JEAN PIERRE,  
JOHN ROSSI, WILLIAM R. SHANNON, FRED H.  
SMITH, GARY E. SOBEK, DAMIAN SOBER,  
CARMELA SZYMANSKI, ANTHONY TANZA and  
CYNTHIA TORRES,

Plaintiffs,  
-against- Index No. 3124/17  
GARDA CL ATLANTIC, INC.,  
Defendant.

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DEPOSITION VIA ZOOM OF JOHN ROSSI  
June 29, 2022

Reported by:  
SARA FREUND, CSR

1 J. ROSSI

2 that, right?

3 A. No, ma'am. Garda ended in 2015 of  
4 January, I moved to Florida in February.

5 Q. But you rented in Florida before  
6 that, correct?

7 A. Oh, yes, yes, correct.

8 Q. When did you start renting in  
9 Florida?

10 A. 2015.

11 Q. Did you ever have a residence in  
12 Florida before 2015?

13 A. No, ma'am.

14 Q. So you never had an apartment before  
15 2015 in Florida?

16 A. No, ma'am.

17 Q. You never rented a mobile home or  
18 any other type of property in Florida prior  
19 to 2015?

20 A. No, ma'am.

21 Q. In Lake Ronkonkoma did you own or  
22 rent?

23 A. I rented, ma'am.

24 Q. What type of housing was it?

25 A. It was actually a house, we had the

1 J. ROSSI

2 Q. Do you recall the dates that you  
3 worked in that location in Central Islip?

4 A. That would be from May 27th of 1979  
5 to the end of January 2015.

6 Q. Did there come a time that you  
7 learned that Garda was closing the Central  
8 Islip location?

9 A. Yes. Actually, I think it was a  
10 month before they actually closed that  
11 terminal.

12 Q. Who was your supervisor at Garda in  
13 2014, 2015?

14 A. My manager was Ed Gillen.

15 Q. Did you say Ed Gillen?

16 A. Edward Gillen.

17 Q. Did you report directly to him?

18 A. Yes, ma'am. He was our manager.

19 Q. Did you have any other managers that  
20 you recall?

21 A. Yes, but I can't remember his name  
22 at moment.

23 Q. What type of vehicle did you drive  
24 as an armed courier?

25 A. It was actually an armored. If you

1 J. ROSSI

2 want me to go back to the manager, his name  
3 was Prakash.

4 Q. Do you know how to spell that?

5 A. P-R-A-K-A-S-H. I don't remember his  
6 last name, ma'am.

7 Q. Okay. Were you a member of a union  
8 at Garda?

9 A. Yes, ma'am.

10 Q. Did you hold any position with the  
11 union?

12 A. I was actually the vice president.

13 Q. In that role, were you involved at  
14 all in the closing of the location in Central  
15 Islip?

16 A. No. Not that I -- no.

17 Q. You said about 30 days prior to the  
18 closing you learned that it was going to  
19 close; is that fair?

20 A. Correct, ma'am.

21 Q. Were you offered a position  
22 elsewhere within Garda?

23 A. Yes, ma'am.

24 Q. Where were you offered a position?

25 A. They asked me, because I had so much

1 J. ROSSI

2 seniority, they said I would be able to pick  
3 anywhere in the state, so I picked West Palm  
4 Beach.

5 Q. Did you mean in the country? You  
6 said you were able to pick anywhere in the  
7 state.

8 A. I'm sorry, country, yes.

9 Q. Were you transferred to the Long  
10 Island city location at any time?

11 A. Yes, ma'am.

12 Q. When was that?

13 A. January 15th.

14 Q. Did you actually report to work  
15 there?

16 A. Correct, yes.

17 Q. For how long?

18 A. I believe it was three weeks.

19 Q. And then you requested a transfer to  
20 West Palm Beach; is that right?

21 A. Correct, yes, ma'am.

22 Q. What position did you request  
23 transferring to?

24 A. It would be the same: armed  
25 courier/driver.

1 J. ROSSI

2 Q. Do you know the address of that  
3 location in West Palm Beach?

4 A. No, ma'am, I'm sorry.

5 Q. And did you actually work in West  
6 Palm Beach for Garda?

7 A. Yes, ma'am.

8 Q. For how long a period of time?

9 A. Five months.

10 Q. Were you certified in firearms at  
11 that time?

12 A. Firearms, no. I have to get re-  
13 certified because it was the State of  
14 Florida.

15 Q. So were you carrying while working  
16 in Florida?

17 A. No, ma'am -- well, when I received  
18 my certification, I was.

19 Q. How long did it take you to get your  
20 certification?

21 A. Two weeks.

22 Q. What did you do in the meantime,  
23 those two weeks -- did you work?

24 A. I was actually just a driver.

25 Q. Of what type of vehicle?

1 J. ROSSI

2 obligation to produce them, and now Garda  
3 is using them in a deposition.

4 MS. GRIFFITH: I'm asking him  
5 questions about the information.

6 MR. MOSER: You represented on the  
7 record that his pay stubs said certain  
8 things, so you did use them.

9 MS. GRIFFITH: I didn't actually  
10 present them.

11 Q. Mr. Rossi, do you have any pay stubs  
12 in your possession from the time that you  
13 worked at Garda?

14 A. No, I don't. I apologize.

15 MS. GRIFFITH: So other than the  
16 documents and information that I call for  
17 the production of, I'm finished with the  
18 deposition of Mr. Rossi.

19 MR. MOSER: I'm going to ask Mr.  
20 Rossi a couple of questions.

21 EXAMINATION BY

22 MR. MOSER:

23 Q. John?

24 A. Yes.

25 Q. When did you move to Florida?

1 J. ROSSI

2 A. February of 2015.

3 Q. Did you give a Florida address to  
4 Garda in 2011?

5 A. I don't recall -- no -- I don't  
6 think so.

7 Q. Why not? Why don't you think you  
8 gave Garda a Florida address in 2011?

9 A. Because I wasn't living here.

10 Q. And what address did you give Garda  
11 before you moved to Florida?

12 A. The only one I can remember is where  
13 I'm residing now.

14 Q. And when you were living in New York  
15 before you moved to Florida -- are you okay,  
16 John?

17 A. Yeah, I'm fine.

18 Q. When you were living in New York  
19 before you moved to Florida, what address did  
20 you give Garda?

21 A. I believe it was the one in  
22 Ronkonkoma.

23 Q. Ms. Griffith has stated that there  
24 are pay stubs from 2011 that show your  
25 Florida address. Do you know why that is?



1 J. ROSSI

2 A. I was still working.

3 Q. Okay. Do you know why there is a  
4 pay stub out there that says that you were  
5 living in Florida in 2011?

6 A. No -- I can't recall.

7 Q. Were you living in Florida in 2011?

8 A. No, 2015.

9 Q. Okay. Did you give Garda a Florida  
10 address before 2015?

11 A. I don't recall. I mean, when they  
12 gave me the transfer.

13 Q. I'm talking about before the  
14 transfer. I'm talking about when you were  
15 living in New York, before they closed the  
16 facility --

17 A. Right.

18 Q. You were living in New York before  
19 they closed the facility, or that you knew  
20 that they were going to closing the facility,  
21 at that time did you give Garda a Florida  
22 address?

23 A. No, sir.

24 Q. And after you moved to Florida in  
25 February 2015, did you have a residence in

1 J. ROSSI

2 any other state?

3 A. No, I did not.

4 Q. And since moving to Florida in  
5 February 2015, have you lived there  
6 continuously?

7 A. Yes, sir.

8 Q. Once you moved to Florida, did you  
9 intend to move anywhere else?

10 A. No, absolutely not, no.

11 Q. I have no further questions.

12 MS. GRIFFITH: Thank you for your  
13 time today, Mr. Rossi.

14 THE WITNESS: Thank you.

15 (Time noted: 12:08 p.m.)

16

17

18 JOHN ROSSI

19 Subscribed and sworn to

20 before me this day

21 of 2022.

22

23

24 Notary Public

25